

THE HONORABLE JOHN C. COUGHENOUR

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES,

Plaintiff,

vs.

KENNETH WARREN RHULE and
KENNETH JOHN RHULE,

Defendants.

Case No. 2:20-cr-00105-JCC

STIPULATION AND [PROPOSED]
ORDER RE-NOTING
GOVERNMENT'S MOTION FOR
ENTRY OF A PROTECTIVE ORDER
RESTRAINING CERTAIN
FORFEITABLE PROPERTY (DKT. 72)
AND EXTENDING TIME TO
RESPOND

**Note on Motions Calendar: October 7,
2020**

The government and defendants Kenneth Warren Rhule and Kenneth John Rhule, by and through their respective attorneys, hereby STIPULATE AND AGREE as follows:

1. On September 30, 2020, the government filed a "motion for entry of a protective order restraining certain forfeitable property" (Dkt. 72). That motion is currently noted on the motions calendar for October 9, 2020.

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2. Counsel have stipulated to re-note the motion for October 16, 2020, and to allow the defendants an additional seven days to respond, such that any response will now be due on October 14, 2020, as reflected in the chart below:

Event	Current Date	Proposed Extension
Noting date for Dkt. 72	10/9/20	10/16/20
Deadline for Response to Dkt. 72	10/7/20	10/14/20

3. The parties stipulate and agree that there is good cause for this extension. The extension is needed to allow counsel for the defendants adequate time to confer with their clients, one of whom remains in custody with limited ability to communicate with counsel. The additional time also allows defense counsel time to confer with the government and to potentially seek a negotiated agreement that would resolve the motion.
4. The parties do not seek the adjustment of any other case deadlines at this time.

SO STIPULATED.

DATED this 7th day of October, 2020.

Respectfully submitted,

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[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED this _____ day of _____, 2020.

JOHN C. COUGHENOUR
UNITED STATES DISTRICT JUDGE

Presented by:

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